

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

United States Courts  
Southern District of Texas  
FILED

SEP 23 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

VS.

CASE NO. 2:17-CR-390

DAVID KEITH WILLS

§  
§  
§  
§  
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§

DEFENDANT'S AMENDED EXHIBIT LIST FOR TRIAL

Exhibit No.	Description	Offer:	Admitted:	Not Accepted	Offer of Proof
1	7 <sup>th</sup> Grade Attendance Reports L.S. DKW:00000001- DKW:00000005	OBJ			w/o
2	Grade 7 Grades L.S. DKW:00000006- DKW:00000007	OBJ			w/o
3	L.S. Student Incident Reports DKW:00000008- DKW:00000011	OBJ			w/o
4	BISD Gifted and Talented Student Performance Record 2012-2013 L.S. DKW:00000037- DKW:00000043	OBJ			w/o
5	BISD Gifted and Talented Student Performance Record 2011-2012 L.S. DKW:00000044- DKW:00000047	OBJ			w/o
6	BISD Gifted and Talented Student Performance Record 2010-2011 L.S. DKW:00000048- DKW:00000051	OBJ			w/o
7	Galaxy Program Academic Acceptance Form L.S.	OBJ			w/o

	DKW:00000052- DKW:00000057			
8	BISD Gifted and Talented Student Performance Record 2009-2010 L.S. DKW:00000058- DKW:00000061	OBJ		wlo
9	Oliveria Middle School Student Release form '14-15 L.S. DKW:00000062- DKW:00000065	OBJ		wlo
10	Valley Regional Medical Center Medication Center UTI L.S. DKW:00000096- DKW:000000108	OBJ		
11	Valle/Villarreal Dental Center L.S. DKW:000000109- DKW:000000120	OBJ		wlo
12	Invoices to Washington D.C. Trip DKW:000000122- DKW:000000133	<del>OBJ</del>	Pre Admit	
13	People to People Correspondence DKW:000000134- DKW:000000137	<del>OBJ</del>	Pre Admit	
14	8/22/12 Thurber Visit DKW:000000140- DKW:000000142	OBJ		wlo
15	2/18/13 Thurber Visit DKW:000000143- DKW:000000146	OBJ		wlo
16	5/6/13 Thurber Visit DKW:000000147- DKW:000000148	OBJ		wlo
17	8/12/13 Thurber Visit DKW:000000149- DKW:000000151	OBJ		wlo
18	8/27/13 Thurber Visit DKW:000000152- DKW:000000156	OBJ		wlo
19	1/7/14 Thurber Visit DKW:000000157- DKW:000000159	OBJ		wlo

20	2/13/14 Thurber Visit DKW:000000160- DKW:000000164	OBJ		W/D
21	4/16/14 Thurber Visit DKW:000000165- DKW:000000167	OBJ		W/D
22	6/27/14 Thurber Visit DKW:000000168- DKW:000000173	OBJ		W/D
23	8/4/14 Thurber Visit DKW:000000174- DKW:000000175	OBJ		W/D
24	7/8/14 Thurber Visit DKW:000000176- DKW:000000178	OBJ		W/D
25	8/7/14 Thurber Visit DKW:000000179- DKW:000000181	OBJ		W/D
26	8/11/14 Thurber Visit DKW:000000182- DKW:000000184	OBJ		W/D
27	8/20/14 Thurber Visit DKW:000000185- DKW:000000187	OBJ		W/D
28	8/27/14 Thurber Visit DKW:000000188- DKW:000000190	OBJ		W/D
29	11/10/14 Thurber Visit DKW:000000191- DKW:000000193	OBJ		W/D
30	11/22/14 Thurber Visit DKW:000000194- DKW:000000196	OBJ		W/D
31	2/13/15 Thurber Visit DKW:000000197- DKW:000000201	OBJ		W/D
32	2/18/15 Thurber Visit DKW:000000202- DKW:000000204	OBJ		W/D
33	3/3/15 Thurber Visit DKW:000000205- DKW:000000207	OBJ		W/D
34	Quest Diagnostics Urine test L.S. DKW:000000208- DKW:000000214	OBJ		W/D

35	3/22/14 Days Inn Folio DKW:000000246	OBJ		W/D
36	4/11/14 Days Inn Folio DKW:000000247	OBJ		W/D
37	6/6/14 Days Inn Folio DKW:000000248	OBJ		W/D
38	6/29/14 Days Inn Folio DKW:000000249	OBJ		W/D
39	7/25/14 Days Inn Folio DKW:000000250	OBJ		W/D
40	9/17/14 Days Inn Folio DKW:000000251	OBJ		W/D
41	10/25/14 Days Inn Folio DKW:000000252	OBJ		W/D
42	12/31/14 Days Inn Folio DKW:000000253	OBJ		W/D
43	Cameron County Family Violence Task Force Report DKW:000000507- DKW:000000512	OBJ not go to jury		W/D
44	Tx DPS Family Violence Report DKW:000000513- DKW:000000514	OBJ not go to jury		W/D
45	Tx DPS Sexual Assault Report DKW:000000515- DKW:000000516	OBJ not go to jury		W/D
46	BPD Submission Form DKW:000000534	OBJ not go to jury		
47	BPD Release of Property 4- 16-15 iPhone 5s DKW:000000588	OBJ	pre admit	
48	BPD Release of Property 4- 14-15 DKW:000000589	OBJ	pre admit	
49	4-22-15 BPD Receipt of Evidence Property iPhone 5s DKW:000000590	OBJ	pre admit	
50	4-22-15 BPD Receipt of Evidence Property DKW:000000591	OBJ	pre admit	
51	4-16-15 BPD Receipt of Evidence Property iPhone 5s DKW:000000592	OBJ	pre admit	

may stipulate

52	5-6-15 BPD Receipt of Evidence Property DKW:000000593	OBJ	pre admit	
53	5-6-15 BPD Receipt of Evidence Property DKW:000000594	OBJ		W/D
54	Intake Report Child Protective Services DKW:000000673- DKW:000000681	OBJ		W/D
55	DFPS Contact Log Narrative DKW:000000682- DKW:000000685	OBJ		W/D
56	DFPS Intake Report DKW:000000686- DKW:000000694	OBJ		W/D
57	Hudson Elementary Student Release Log 2012/2013 DKW:000000701- DKW:000000712	OBJ	Summaries are okay Sust obj to highlights & notes	
58	Hudson Elementary Student Release Log 2011/2012 DKW:000000713- DKW:000000720	OBJ	Summaries are okay Sust obj to highlights & notes	
59	Oliveria Middle Student Release Form 2013-2014 DKW:000000721- DKW:000000722	OBJ	Summaries are okay Sust obj to highlights & notes	
60	Oliveria Middle Student Release Form 2014-2015 DKW:000000723- DKW:000000726	OBJ	Summaries are okay Sust obj to highlights & notes	
61	Grade Report Oliveria Middle School L.S. DKW:000000732- DKW:000000733	OBJ		W/D
62	Grade Report Hudson Elementary L.S. DKW:000000738	OBJ		W/D
63	GJ Subpoena return Bisd DKW:000000774- DKW:000000782	OBJ	Summaries are okay Sust obj to highlights & notes	
64	South Texas Eye Center Records DKW:000000793- DKW:000000875	OBJ	pre admit	
65	The Children's Doctor Records	OBJ	pre admit	

may stipulate

	DKW:000000876- DKW:000000959				
66A	Wells Fargo Records Losoya DKW:0000001215- DKW:0000001981	<del>OBJ</del>	to be replaced w/ b6A preadmit		
67a	Sarita Checkpoint Data and Car Photos DKW:0000002314- DKW:0000002323	OBJ		10-11-19	
68	DFPS Table of Contents DKW:0000002324- DKW:0000002327	OBJ			W/D
69	DFPS Case File Cover Sheet and Case Event List DKW:0000002328- DKW:0000002364	OBJ			W/D
70	DFPS External Documents (Redacted) WITHDRAWN	OBJ			W/D
70a	CPS Records	OBJ			
70b	CPS Photos	OBJ			W/D
71	CPS Intake Report (Redacted) WITHDRAWN	OBJ			W/D
72	CPS Notification to Law Enforcement Agency of Abuse/Neglect Report DKW:0000002375- DKW:0000002381	OBJ			W/D
73	CPS Application for Emergency Assistance DKW:0000002382- DKW:0000002383	OBJ			W/D
74	CPS Services and Referrals Checklist Report DKW:0000002384- DKW:0000002385	OBJ			W/D
75	CPS Risk Assessment Report DKW:0000002386- DKW:0000002392	OBJ			W/D
76	CPS Investigation Summary for Maria Losoya DKW:0000002393- DKW:0000002399	OBJ			W/D

77	CPS History of Investigation for Maria Losoya DKW:0000002400	OBJ		WD
78	CPS Family Service Plan Evaluation DKW:0000002401- DKW:0000002405	OBJ		WD
79	CPS Conservatorship Removal DKW:0000002406	OBJ		WD
80	Redacted CPS Records WITHDRAWN	OBJ		WD
81	Permanency Conference Notes DKW:0000002429- DKW:0000002431	OBJ		WD
82	CPS Redacted Documents WITHDRAWN	OBJ		WD
83	Contact Log Narrative DKW:0000002618 DKW:0000002626	OBJ		WD
84	CPS Redacted Documents Cont'd WITHDRAWN	OBJ		WD
85	Vehicle Information - 2005 BMW DKW:0000003086- DKW:0000003088	OBJ		WD
86	Vehicle Information - 2009 Lexus DKW:0000003089	OBJ		WD
87	4200 Las Palmas Records with Affidavit DKW:0000003116- DKW:0000003129	OBJ		
88	506 Lakewood Property Records with Affidavit DKW:0000003130- DKW:0000003265	OBJ		WD
89	SANE Records with Affidavit DKW:0000003270- DKW:0000003344	<del>OBJ</del>	pre admit	
92	Records for 210 Oak Bay #402 in Rockport with Affidavit DKW:0000003398- DKW:0000003418	<del>OBJ</del>	pre admit	



93	Omni Hotel Receipt with Business Records Affidavit DKW:0000003419- DKW:0000003420	OBJ OVR	pre admit		
94	GBT Port Isabel Lease Agreement 11820 Parklawn Dr., Ste. 204 with Affidavit DKW:0000003421- DKW:0000003440		pre admit		
95	GBT Port Isabel Settlement Statement 503 Southpoint Dr. with Affidavit DKW:0000003441- DKW:0000003497		pre admit		
96	HUD Settlement Statement 2207 Cape McCan in Rockport with Affidavit DKW:0000003498- DKW:0000003501		pre admit		
97	Records for 110 Villa Doce with Affidavit DKW:0000003502- DKW:0000003517	OBJ			
98	M&T Bank Records 2011- 2015 David Wills DKW:0000003518- DKW:0000003558	OBJ			WD
99	Eye Institute of Corpus Christi Records for DKW DKW:0000003559- DKW:0000003575	OBJ Subject to hearsay	6-4-19		
100	Starbucks Store Locations and Corresponding Store Numbers DKW:0000003576- DKW:0000003584	OBJ			
101	Richard Losoya Blue Federal Credit Union Records DKW:0000003585- DKW:0000004082	OBJ			WD
102	Richard Losoya Bank of America Records DKW:0000004083- DKW:0000004236	OBJ			WD
103	National Protocol for Sexual Assault Medical Forensic Examination	OBJ			Overs not go to jury



	DKW:0000004237- DKW:0000004614				
104	<del>Losoya Sprint Records</del> <del>DKW:0000004934-</del> <del>DKW:0000005378</del>				WD
105	Losoya Jail Calls DKW:0000005379- DKW:0000005397	OBJ			
106	Randy Moore Recorded Statement DKW:0000005560	OBJ			WD
107	Randy Moore Affidavit <del>DKW:0000005398-</del> DKW:0000005405	OBJ			WD
108	Randy Moore Drawing DKW:0000005406- DKW:0000005407	OBJ			
109	Nicholas Stambaugh Bank Records DKW:0000005408- DKW:0000005521	<del>OBJ</del>	pre admit		
110	Jane Doe Social Media Posts DKW:0000005522- DKW:0000005559	OBJ			
111	Signed Nunez Stipulation DKW:0000005561- DKW:0000005565	OBJ Sust.			
112	Photos of Apple Desktop Computer turned over by Defense DKW:0000005566- DKW:0000005569	OBJ			
113	Photo of two GBT Shrimp DKW:0000005570	OBJ		demonstrative only	
114	Photo of GBT Assembly Line DKW:0000005571	OBJ		demonstrative only	
115	Photo of GBT Shrimp DKW:0000005572	OBJ		demonstrative only	
116	Photos of Water Levels at GBT Shrimp Farm Rockport DKW:0000005573- DKW:0000005575	OBJ			
117	Aquaculture Magazine Article on GBT DKW:0000005576- DKW:0000005581	OBJ DVR	10/4/19		

118	Photos of Valley Baptist Medical Center Colposcope DKW:0000005582- DKW:0000005584		pre admit		
<del>119</del>	David Wills Blog DKW:0000005585- DKW:0000005952	OBJ			
120	Photo of David Wills Genital Area DKW:0000005953		pre admit		
121	Photos of David Wills Scar on Abdomen DKW:0000005954- DKW:0000005955		pre admit pre admit		
<del>121</del>	Border Crossing Photo of F-150 DKW:0000005956	OBJ			
122	Border Crossing Photo of BMW DKW:0000005957	OBJ			
123	Sarah Baker text to David Wills DKW:0000005958	OBJ			
<del>125</del>	Photo of the Kids DKW:0000005959	OBJ	10/4/19		
126	Photos of GBT Apple Laptop DKW:0000005960- DKW:0000005961	OBJ			
127	Article and Photo of Sonja Eddleman using colposcope DKW:0000005962- DKW:0000005967	<del>OBJ</del>	pre admit		
128	GBT Port Isabel Demolition Contract DKW:0000005968	OBJ			
129	GBT Port Isabel Lease Payments DKW:0000005969	OBJ			
130	Miguel Angel Uresti W9 DKW:0000005970	OBJ			
131	Online Omni Hotel Photographs from Website DKW:0000005971- DKW:0000005972	OBJ	9/25/19		
132	April 13, 2015 Video		pre admit		
133	April 13, 2015 Video		pre admit		
134	April 13, 2015 Video		pre admit		

Respectfully Submitted,

By: /s/ Cynthia E. Orr  
Cynthia E. Orr

CYNTHIA E. ORR\*

Bar No. 15313350

GERALD H. GOLDSTEIN

Bar No. 08101000

ABASI D. MAJOR

Bar No. 24096504

DEBRAL INNOCENTI

Bar No. 24046135

DESTINEE N. RUSSELL

Bar No. 24096406

JOHN S. GILMORE, III

Bar No. 24096676

GOLDSTEIN & ORR

310 S. St. Mary's St. 29th Fl.

San Antonio, Texas 78205

210-226-1463 phone

210-226-8367 facsimile

Email: whitecollarlaw@gmail.com

Email: ggandh@aol.com

Email: abasi.major@gmail.com

Email: debraplacette@gmail.com

Email: drussell.ggho@gmail.com

Email: johnstuartgilmore@gmail.com

JOHN T. HUNTER

Bar No. 24077532

HUNTER, LANE & JAMPALA

310 S. St. Mary's St., Suite 1740

San Antonio, Texas 78205

210-202-1076 phone

210-880-6162 facsimile

Email: jth753@gmail.com

JOHN S. GILMORE

Bar No. 07958500

622 South Tancahua

Corpus Christi, Texas 78401

361-882-4378 phone  
361-882-3635 facsimile  
Email: gilmorelaw@msn.com

RENE RODRIGUEZ  
Bar No. 17148400  
433 S. Tancagua St.  
Corpus Christi, Texas 78401  
361-815-3888 phone  
361-882-1919 facsimile  
Email: rene.rodriguez@rdrlaw.com

TERRY W. SHAMSIE  
Bar No. 18089800  
LAW OFFICE OF TERRY W. SHAMSIE  
4002 Castle Valley Dr.  
Corpus Christi, TX 78410  
361-960-6300 phone  
E-mail: Terryshamsie@hotmail.com

RICHARD FELDMAN  
District of Columbia Bar No. 399259  
PO Box 340  
Rindge, NH 03461  
(609) 930-6444 phone  
Email: mls@usa.net

DANTE E. DOMINGUEZ  
Bar No. 24086677  
Law Office of Dante Eli Dominguez  
6243 Interstate Hwy 10, Suite 503  
San Antonio, Texas 78201  
210-227-9399-1463 phone  
210-855-1863 facsimile  
Email: ddominguez.law@gmail.com

Attorneys for Defendant,  
DAVID KEITH WILLS

*\*Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been electronically delivered to Assistant United States Attorney Zahra Fenelon, as a registered participant to the CM/ECF document filing system, and by email to Zahra.fenelon@usdoj.gov on this the 26th day of August 2019.

By: /s/ Cynthia E. Orr  
Cynthia E. Orr

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID WILLS,

Defendant.

Criminal Action No:  
2:17-CR-390

Defendant's supplemental witness list

Number	Description	Offer	Admitted	Offer of Proof
135	Phone Extraction (5000+pg) (full record from			
<del>135.2</del>	<del>GE 65 photo</del>		10-3-19	
136	Omni Hotel Records		9-25-19	
137	Rolex Records			
138	Days Inn Hotel Photos			
139	Omni Hotel Photos			
<del>140</del>	<del>GBT Business</del>			
<del>140.1, 140.2</del>	<del>Location Photos</del>	<del>demonstrative only</del>		
141	AT&T Records			
142	Video of Nora Archer by Lucio on 4/23/15			
143	Audio of Lucio Phone Call w/ Ivan Castro on 4/13/15			
144	Audio of Lucio Phone Call w/ Randy Moore			
145	Video of Lucio Interview w/ school counselor Vidaurri 4/8/15			
146	Losoya Video Interview - 2/10/17			

147	Losoya Video Interview – 7/21/17			
148	Losoya Video Interview – 8/1/17			
149	Losoya Video Interview – 4/9/15			
150	Losoya Video Interview – 4/23/15			
151 151A	Audio Recording of Maria Losoya Jail Phone Calls			
152	Odom Interviews with Sara Baker-Benz on 8/1/19			
153	Lucio Video Interview of Gaspar Garcia 4/13/15			
154	Lucio Video Interview of Richard Losoya 4/23/15			
155	Lucio Video Interview of Elizabeth de la Garza 4/10/15			
156	Nunez Webpage 09242018		9-26-19	
157	HSI Subpoena – Sprint		9-26-19	
158	GBT Photo			
159	GBT Photo		demonstrative only	
160	GBT Photo		demonstrative only	
161	GBT Photo		demonstrative only	
162	GBT Photo		demonstrative only	
163	GBT Photo		demonstrative only	
164	Photo of Employees of GBT		demonstrative only	



165	Photo of Employees of GBT		demonstrative only	
166	TKS Group Letter		demonstrative only	
167	Photo of Laurie White Wills	obj sust.	demonstrative only	
168	Family Photo with Laurie, DKW and Stephen	obj sust.		
169	DKW Check to Candy Losoya \$325 July 12, 2012			
170	Losoya \$800 Check March 10, 2015			
171	Stripes Gas Receipt - Brownsville			
172	Omni Email - Stephen White			
173	Mike Uresti Checks and Emails			
174	Artisanal Meme			
175	Transcript of CAC interview			
176	Intentionally skipped			
177	One page of transcript of CAC interview re: JD has two phones			
178	Omni Hotel PMS record		9-25-19	
179	Schlitterbahn Scott Friedman Receipt			
180	Docket Attorney General (Maria Losoya v. BART			
181				
182			9-26-19	
183			demonstrative only	
184			9-26-19	
185				
186			9-26-19	
187				
188				

189		9-27-19
		9-27-19
190		9-27-19
191	Redacted CPS records	9-27-19
192		9-27-19
193	not to jury	
194	photo - bar	10-2-19
195	Bus. Rec. Affidavit	10-1-19
196		
197		
198	Aug 1 Report	demonstrative only
199		9-30-19
200		
201		
202		
203		demonstrative only
204		demonstrative only
205		demonstrative only
206	Photos - Madeira	10-2-19
207	Jewelry Repair photos	10-2-19
208		
209		
210	Serial #- Laptop	10-1-19
211		10-2-19
212		
213	Minor Report	demonstrative only
214		
215		10-3-19
216		10-3-19
217		10-3-19
218		10-3-19
217.1		10-3-19
217.2		10-3-19
219		
220		
221		
222		
223		

224.1			10-4-19		
224.2			10-4-19		
224.3			10-4-19		

RENE RODRIGUEZ  
Bar No. 17148400  
433 S. Tancagua St.  
Corpus Christi, Texas 78401  
361-815-3888 phone  
361-882-1919 facsimile  
Email: rene.rodriguez@rdrlaw.com

TERRY W. SHAMSIE  
Bar No. 18089800  
LAW OFFICE OF TERRY W. SHAMSIE  
4002 Castle Valley Dr.  
Corpus Christi, TX 78410  
361-960-6300 phone  
E-mail: Terryshamsie@hotmail.com

RICHARD FELDMAN  
District of Columbia Bar No. 399259  
PO Box 340  
Rindge, NH 03461  
(609) 930-6444 phone  
Email: mls@usa.net

DANTE E. DOMINGUEZ  
Bar No. 24086677  
Law Office of Dante Eli Dominguez  
6243 Interstate Hwy 10, Suite 503  
San Antonio, Texas 78201  
210-227-9399-1463 phone  
210-855-1863 facsimile  
Email: [ddominguez.law@gmail.com](mailto:ddominguez.law@gmail.com)

Attorneys for Defendant,  
DAVID KEITH WILLS

*\*Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been electronically delivered to Assistant United States Attorney Zahra Fenelon, as a registered participant to the CM/ECF document filing system, on this the 26th day of September 2019.

By: /s/ Abasi D. Major  
Abasi D. Major